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January 7, 2025

By ECF

Magistrate Judge Joseph A. Marutollo:
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Lynch v. The Department of Education of the City of New York, et al., 24-cv-7795-DG-JAM

Dear Magistrate Judge Marutollo:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel for the City of New York, attorney for the Department of Education of the City of New York and David Banks (collectively, Defendants”) in the above-referenced action. I write to respectfully request an extension of time, from January 9, 2025 to March 10, 2025, for Defendants to respond to the complaint. This is Defendants' first request for an extension of time to respond to the complaint. The Court has scheduled an Initial Status Conference for February 18, 2025 (see ECF No. 4), and ordered the parties to submit a proposed scheduling order by February 13, 2025. Defendants respectfully request an adjournment of those dates until after Defendants have responded to the Complaint. Plaintiff’s phone number and email address do not appear in the complaint or on the docket. This Office was accordingly unable to contact Plaintiff to request her consent to this motion.

An extension of time until March 10, 2025 will allow this Office to adequately investigate the allegations made in the complaint and prepare a proper response. The complaint in this matter consists of 69 lengthy paragraphs setting forth various allegations of discrimination. Additional time is needed to collect and review documents in order to appropriately respond to the complaint, and to speak with potential witnesses concerning the allegations.

Therefore, this Office respectfully requests that the Court grant Defendants’ request for an extension of time to respond to the complaint until March 10, 2025.

Defendants thank the Court for its consideration of this request.

Respectfully submitted,

Ilona J. Ehrlich

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Assistant Corporation Counsel

cc: Corrine Lynch (via Mail)
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